

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

SARAH PATTON, ERICA KITTS, and)	
MARILEE HARRISON, individually and)	
on behalf of all similarly-situated persons,)	Civil No.: 3:15-cv-01013
)	
Plaintiffs,)	
)	MAGISTRATE JUDGE FRENSLEY
v.)	
)	CLASS AND COLLECTIVE
SERVICESTOURCE DELAWARE, INC.)	ACTION COMPLAINT
d/b/a SERVICESTOURCE)	
INTERNATIONAL, INC.)	JURY TRIAL DEMANDED
)	
Defendant.)	

**PLAINTIFFS' MOTION FOR FINAL SETTLEMENT APPROVAL OF
SUPPLEMENTAL RULE 23 CLASS ACTION CLAIMS, SUPPLEMENTAL FLSA
§216(b) COLLECTIVE ACTION CLAIMS, AND CLASS COUNSEL'S APPLICATION
FOR A SUPPLEMENTAL AWARD OF ATTORNEY'S FEES**

Plaintiffs, individually, and on behalf of all similarly-situated persons with Supplemental Rule 23 Class Claims and Supplemental FLSA Collective Action Claims, file this Motion requesting 1) final approval of the parties' Supplemental Settlement Agreement (the "Supplemental Settlement") filed with the Court on May 22, 2019 (Doc. No. 130-1); and, 2) approve Class Counsel's Supplemental Fee Request.

The Court preliminarily approved the Supplemental Settlement on May 31, 2019. (Doc. No. 136.) Plaintiffs now move the Court to set a hearing date for final approval of the Supplemental Settlement and enter a Final Order: 1) approving the proposed Supplemental Settlement including terms of payment and distribution to members of the Supplemental Rule 23 and FLSA Classes; and 2) approving Class Counsel's request for attorney's fees.

This Motion is supported by the following pleadings previously filed or filed contemporaneously herewith:

1. Plaintiffs' Memorandum of Law, filed contemporaneously herewith;
2. Supplemental Settlement Agreement, with attached exhibits (Doc. No. 130-1);
3. Declaration of Attorney Martin D. Holmes (Doc. No. 130-2);
4. Supplemental Declaration of Attorney Martin D. Holmes (Doc. No. 134-2);
5. Declaration of Attorney W. Michael Hamilton (Doc. 134-3);
6. Declaration of Settlement Administrator Melissa E. Baldwin, dated May 30, 2019 (Doc. 134-1);
7. Declaration of Settlement Administrator Melissa E. Baldwin, dated July 25, 2019, attached as Exhibit 1;
8. Second Supplemental Declaration of Attorney Martin D. Holmes, attached as Exhibit 2;
9. Proposed Final Approval Order, attached as Exhibit 3.

WHEREFORE, Plaintiffs respectfully request that the Court set a hearing date for final approval of the Supplemental Settlement and enter the parties' proposed Final Approval Order, thereby approving the parties' Supplemental Settlement Agreement resolving the claims of the Supplemental Rule 23 and FLSA Settlement Classes, and approving Class Counsel's Application for a Supplemental Award of Attorney's Fees.

Respectfully submitted,

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*Attorneys for Plaintiffs and Putative Opt-in
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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2019, a true and exact copy of the foregoing has been filed and served on the following via the Court's ECF filing system:

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